

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ARTURO BEDOLLA, individually and )  
on behalf of similarly situated )  
individuals, )  
 )  
 *Plaintiff,* ) No. 20-cv-02526  
 )  
 v. ) Hon. Elaine E. Bucklo  
 )  
 PAYCHEX OF NEW YORK LLC, a ) Magistrate Hon. Gabriel A. Fuentes  
 Delaware limited liability company, )  
 )  
 *Defendant.* )

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL OF ACTION  
PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i)**

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Arturo Bedolla (“Plaintiff”) hereby voluntarily dismisses this action without prejudice.

1. On April 24, 2020, Defendant Paychex of New York, LLC (“Defendant”) removed this matter from the Circuit Court of Cook County, Illinois. (Dkt. 1).

2. Pursuant to the Northern District of Illinois' Amended General Order 20-0012 and its subsequent amendments, as well as the Court's April 24, 2020 Order (Dkt. 10), Defendant's deadline to respond to Plaintiff's complaint was extended to June 26, 2020.

3. On June 25, 2020, the Court granted Defendant's unopposed motion to extend its deadline to respond to Plaintiff's complaint to July 15, 2020. (Dkt. 16).

4. On July 14, 2020, the Court granted the Parties' joint motion to stay this matter, (Dkt. 19), and granted the Parties' subsequent joint requests to continue the stay. (Dkts. 21, 23, 25).

5. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), a plaintiff may dismiss an action without court order by filing a notice of dismissal before the defendant serves either an

answer or motion for summary judgment. Defendant has neither answered Plaintiff's Class Action Complaint nor served a motion for summary judgment.

6. Accordingly, Plaintiff hereby voluntarily dismisses this action without prejudice as to all claims asserted by Plaintiff and the putative class.

Dated: November 19, 2020

Respectfully submitted,

ARTURO BEDOLLA

By: /s/ Timothy P. Kingsbury  
*One of Plaintiff's Attorneys*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 19, 2020, I caused the foregoing *Plaintiff's Notice of Voluntary Dismissal of Action Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i)* to be electronically filed with the Clerk of Court using the CM/ECF system. A copy of said document will be electronically transmitted to all counsel of record.

/s/ Timothy P. Kingsbury